

- AX  
BX  
CX  
DX
52. (New) The system of claim 51 where the computer converts the voice data to text.
53. (New) The system of claim 49 where one of the source modes for the gateway provides the voice data to the telephone.
54. (New) The system of claim 53 where another of the source modes for the gateway provides the voice data also to the computer.
55. (New) The system of claim 54 where the computer converts text to the voice data.

### REMARKS

Applicant has carefully reviewed and considered the Office Action mailed on October 3, 2002, and the references cited therewith. This amendment cancels pending claims 1-22 without prejudice, and adds new claims 23-55, which are now the only claims pending in the Application.

The amendment to Fig. 1 adds a detailed English label for element 100. In Fig. 2, the labels next to block 202 have been expanded to "Yes" and "No." The attached sketches show the amendments in red, and corrected Drawing sheets are supplied herewith.

In response to the requirements for amending the Specification, the title is changed to describe the invention to which the claims are directed. On page 9, the obviously incorrect reference to Figure 1 is changed to "Table 1, as pointed out by the Examiner.

None of these amendments introduce any new matter prohibited by 35 U.S.C. §132.

. The objection to claim 20 is averted by the cancellation of this claim without prejudice.

Claims 1-22 were rejected under 35 U.S.C. §102 or 35 U.S.C. §103. Applicant reserves the right to submit a declaration antedating one or more of the references cited in connection with the rejections. The cancellation of these claims without prejudice obviates these rejections.

New claims 23-55, of equivalent or broader scope than claims 1-22, clearly avoid the cited reference to Perrone. Perrone proposes a system for associating voice with other data and for synchronizing a session involving both, so that both may be employed together in an application such as voice recognition and interactive response by a site on the World Wide Web.

Although Perrone describes several variants of his system involving different devices, the connections among those devices—and the sources and sinks for the voice data—are fixed and immutable.

Applicant offers a system for processing voice data (and other data as well) according to variable connections among multiple voice-processing devices. In fact, Applicant's system could implement many of Perrone's different embodiments within a single system, merely by changing the source and sink modes to establish different device connections on the fly.

New method claim 23 clarifies the differences from Perrone by "establishing a connection"<sup>1</sup> for the voice data from one or more devices to one or more other devices in accordance with "selected source and sink modes." Perrone has no such modes for changing the routing of voice data among devices within his system. Perrone certainly does not suggest any multiple source modes that can be set to specify "which ... device(s) provide(s) the voice data"<sup>2</sup> to other devices, nor does he suggest multiple sink modes that can be set to specify "which ... device(s) receive(s) the voice data"<sup>3</sup> from other devices.

Dependent claims 24-32 incorporate the recitations of their parent claim 23, and add other features as well. For example, claims 24 and 27 recite that the source and sink nodes are "associated with the devices."<sup>4</sup> Perrone has no source and sink modes, and has nothing remotely similar that could be associated with particular network devices. Claim 25 includes a source mode that specifies "multiple ... devices as sinks"<sup>5</sup> receiving voice data. Claim 26 features a source mode for one device that specifies another device in addition to itself as a voice-data

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<sup>1</sup>—The Specification discusses establishing a connection on page 6 lines 5-10. This connection is mentioned passim, e.g., at page 4 lines 15-27, and at page 7 lines 4-5.

<sup>2</sup>— Providing voice data via a source mode is mentioned at, e.g., page 5 lines 7-9.

<sup>3</sup>— The use of sink modes to specify receiving data is found on, e.g., page 8 lines 16-18.

<sup>4</sup>— Table 1 on page 5 of the Specification has columns indicating the association of source modes with the devices. The rows of Table 1 indicate the devices associated with respective ones of the sink nodes.

<sup>5</sup>— In Table 1, page 5 of the Specification, mode 8 has this characteristic.

source.<sup>6</sup> Claim 28 covers a sink mode that names “multiple ... devices as sources”<sup>7</sup> providing the voice data. Claim 29 declares a sink mode for one device that specifies another device in addition to itself as a voice-data sink.<sup>8</sup> Claim 30 recites that a single one of the devices has at the same time “one of the source modes and a different one of the sink modes.”<sup>9</sup> Perrone, of course, has not the faintest suggestion of this feature. As to claims 31 and 32, the Office Action notes that Perrone lacks any kind of locking or semaphores.

Claims 33-37 recite a computer-readable medium for carrying out methods according to the invention. Independent claim 33 is patentable over the Perrone reference for the same reasons as method claim 23, above. Claim 34 distinguishes over the reference for the same reasons as claims 24 and 27. Claim 35 recites the source and/or sink modes having multiple source or sink devices.<sup>10</sup> Claims 36 and 37 distinguish Perrone in the same manner as do method claims 30 and 31.

Independent apparatus claim 38 delineates a system aspect of the invention. The devices of the network have “associated source and/or sink modes” for the purpose of providing and/or receiving voice data. The Perrone patent has no modes that belong to his different devices as such, in the manner shown in the rows and columns of Table 1, page 5 of the Specification. The streaming controller of claim 38 selects among the modes “to establish a connection”<sup>11</sup> among the devices. Perrone has connections that, to the extent they might not be fixed, could possibly be established only by individual application programs running in the different devices, with no coordination between the programs running on different devices, so that each would have to be run separately and tied together manually. Any change in the connection then would involve

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<sup>6</sup>– Mode 10 in Table 1, page 5, is such a mode.

<sup>7</sup>– In Table 1, modes 11 and 12 have this property.

<sup>8</sup>– See Table 1, modes 7, 8, and 9.

<sup>9</sup>– The examples on pages 7-8 of the Specification employ this feature. See, e.g., page 7 lines 25-26.

<sup>10</sup>– Table 1, page 5, demonstrates that modes 7 through 12 specify three different devices.

<sup>11</sup>– The Specification describes the connection at e.g., page 2 lines 12 and 15, page 4 lines 15-27, page 7 lines 4-5, and page 9 lines 2-5. Page 6 lines 5-10 describe the establishment of the connection.

taking apart the existing connections and going through the procedure all over again to establish a new connection, because Perrone has no overall controller in his system for this purpose. Applicant, in contrast, can reconfigure the voice-data flow of the entire network merely by receiving a control input<sup>12</sup> specifying a few source- and sink-mode designations.

Dependent claims 39-55 include the recitations of parent claim 38, and also embrace other features. Claim 39, for example, states that the modes specify “one of the devices as a source” and “another of the devices as a sink” to provide and receive voice data. Again, Perrone has no mechanism for specifying certain *devices* as voice sources or sinks, and certainly has no suggestion of specifying both source and sink in the same construct. Continuing this theme, claim 40 names “multiple ... devices as sinks.”<sup>13</sup> Claim 41 says that a single source mode specifies “a further one of the devices as a further source.” That is, some of the source modes name multiple sources.<sup>14</sup> In complementary claim 42, a single sink mode names “multiple others of the devices as sources” of voice data.<sup>15</sup> Claim 43 recites a single source mode as specifying “a further one of the devices as a further sink”—one source, multiple sinks.<sup>16</sup> Perrone has not the slightest suggestion of any of these combinations.

Dependent claim 44 selects different source and sink nodes for the same one of the devices,<sup>17</sup> so that a single device operates in one mode for providing voice data, and in an entirely different mode for receiving voice data. This amounts to having the network configured in several different ways at the same time, a capability totally beyond Perrone’s horizon. Claims 45 and 46 inhibit mode changes at certain times; the Office Action admits that Perrone does not

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<sup>12</sup>— See page 5 line 10.

<sup>13</sup>— In Table 1, page 5, modes 8 and 9 exemplify this characteristic.

<sup>14</sup>— See mode 10 in Table 1, page 5.

<sup>15</sup>— Modes 11 and 12 in Table 1 share this feature.

<sup>16</sup>— Modes 7, 8, and 9 of Table 1 include this feature.

<sup>17</sup>— In the example connections on pages 7-8 of the Specification, see page 7 lines 25-26, page 8 lines 7-9, and page 8 lines 14-18.

teach this aspect. Claim 47 declares the controller “separate from the devices” themselves,<sup>18</sup> while claim 48 distributes it “among at least some of the devices.”<sup>19</sup>

Dependent claims 49-55 delineate a few particular network configurations available in the invention. In claim 50, a telephone sources voice data to a gateway,<sup>20</sup> and child claim 51 provides voice data “also to the computer.”<sup>21</sup> Child claim 52 “converts the voice data to text.”<sup>22</sup> In claim 53, one of the source modes “for the gateway provides voice data to the telephone.”<sup>23</sup> Claim 54, a child to claim 53, a source mode associated with a gateway provides voice not only to a telephone, but “also to the computer.”<sup>24</sup> Child claim 55 “converts text to the voice data.”<sup>25</sup>

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<sup>18</sup>— The Specification notes this aspect on page 3 lines 28-29.

<sup>19</sup>— The Spec notes this configuration at page 3 lines 29-31.

<sup>20</sup>— See Table 1, modes 3 and 8.

<sup>21</sup>— Specifically, mode 8.

<sup>22</sup>— See, e.g., page 4 line 11.

<sup>23</sup>— In Table 1, modes 1 and 10.

<sup>24</sup>— Specifically, mode 10.

<sup>25</sup>— See page 4 line 12.

Conclusion

For the above reasons, Applicant urges that the claims are in condition for allowance, and respectfully requests reexamination under 35 U.S.C. §132. The Examiner is invited to telephone Applicant's attorney at (612) 373-6971 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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CERTIFICATE UNDER 37 CFR 1.8: The undersigned hereby certifies that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail, in an envelope addressed to: Commissioner of Patents, Washington, D.C. 20231, on this 3rd day of January, 2003.

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